

**United States Bankruptcy Court
Eastern District of Michigan
Southern Division at Detroit**

Case No. 13-57498-TJT

In Re: **Ernest E. Pettigrew**

Chapter 13

and: **Wanetta Pettigrew**

Debtor(s).

Honorable **Thomas J. Tucker**

DEBTOR(S)' SECOND PROPOSED PLAN MODIFICATION

The above captioned Debtor(s) hereby propose(s) and request(s) that this Honorable Court modify Debtor(s)' Chapter 13 Plan as previously confirmed herein on the following basis:

1. This case was filed on September 19, 2013 and Debtor(s)' Chapter 13 Plan was confirmed herein on or about March 19, 2014. Debtor(s) have previously moved to modify such confirmed Chapter 13 Plan.
2. Attached hereto are a Liquidation Analysis and Worksheet as required by L.B.R. 3015-1(b) E.D.M. (or a customary substitute in the form of a Chapter 13 Trustee computer system "Plan Calc II" analysis.)
3. According the requirements of the Chapter 13 Plan herein, in addition to the regular periodic payments herein, Debtor(s) are required to pay Debtor(s)' tax refunds to the Chapter 13 Trustee.
4. Said requirement is based upon Debtor(s)' schedule of income and expenses herein, and is more particularly based upon the presumption and conclusion from such schedules that all of Debtor(s)' anticipated monthly living expenses are fully and completely scheduled.
5. Debtors have received approximately \$7,792.00 in tax refunds for the 2014 tax year, \$6,916.00 in tax refunds for the 2015 tax year, \$6,625.00 in tax refunds for the 2016 tax year, \$6,933.00 in tax refunds for the 2017 tax year, and \$211.00 in tax refunds for the 2018 tax year, for a total of \$28,477.00 in tax refunds.
6. Since the filing of this Chapter 13 case and the filing of Debtor(s)' schedules of income and expenses and since the Confirmation of Debtor(s)' Chapter 13 Plan (as most recently amended if at all), Debtor(s)' financial circumstances have changed and Debtor(s) have incurred unanticipated and non-recurring necessary living expenses which have not been provided for in Debtor(s) schedule of living expenses herein.
7. Said unanticipated and non-recurring necessary living expenses have caused Debtor(s) fairly to need to use certain of Debtor(s) tax refunds to pay such unanticipated necessary living expenses.
8. More specifically, Debtors' specific unanticipated and non-recurring living expenses are detailed and set forth as follows: (a) uninsured medical expenses \$3,032.92 (in addition to regular prescription costs); automobile repairs \$6,808.28; (c) replacement of appliances \$2,610.46; (d) large home repairs including replacing water heater, faucet and garbage disposal and dry walling ceiling due to water damage caused by a plumbing issue in upstairs bathroom \$3,750.00; (e) purchasing a snow blower necessary to maintain the property effectively during a very snowy winter \$1,200.00; (f) replacement vehicles as Debtors kept older vehicles during the term of the plan \$10,095.00; (g) 2018 state tax liability \$1,009.00; (h) increased auto insurance costs after an accident \$1,467.00 per year for 3 years for a total of \$4,401.00; (i) unscheduled homeowners association dues that Debtors only receive twice a year and forgot to disclose of approximately \$1,200.00 per year for 5 years for a total of \$6,000.00; (j) tax preparation fees of \$1,375.00 The foregoing detailed expenses TOTAL: \$40,281.43. (See attached Affidavit of Joint Debtor).

9. As a result, Debtor(s) are in need of all of the above specified tax refund(s) in the TOTAL amount(s) as specified in paragraph no. 8. above, as Debtor(s) have no additional or alternative source of income to pay such unanticipated necessary living expenses, except from such specified tax refund(s).

10. The only class of creditors impacted by this proposed Plan modification is: Class Nine - General Unsecured Claims. Such class will be impacted as to the amount such class receives shall remain at the base amount of \$1,139.36.

WHEREFORE, Debtor(s) hereby proposes that this Honorable Court modify the Chapter 13 Plan as previously confirmed herein, but in all other respects to allow and require Debtor(s)' confirmed Chapter 13 Plan to remain unchanged:

(a.) Excuse Debtor(s) from paying to the Chapter 13 Trustee their 2014 tax refunds in the total amount of \$7,792.00.

(b.) Excuse Debtor(s) from paying to the Chapter 13 Trustee their 2015 tax refunds in the total amount of \$6,916.00.

(c.) Excuse Debtor(s) from paying to the Chapter 13 Trustee their 2016 tax refunds in the total amount of \$6,625.00.

(d.) Excuse Debtor(s) from paying to the Chapter 13 Trustee their 2017 tax refunds in the total amount of \$6,933.00.

(e.) Excuse Debtor(s) from paying to the Chapter 13 Trustee their 2018 tax refunds in the total amount of \$211.00.

Dated: July 23, 2019

/s/ Roberta W. Andrews

**Samuel G. Firebaugh (P-34276)
Roberta W. Andrews (P-54001)
Firebaugh & Andrews, P.L.L.C.
Attorney for Debtor(s)
38545 Ford Road, Suite 104
Westland, MI 48185
(734) 722-2999
FirebaughAndrews@comcast.net**

**United States Bankruptcy Court
Eastern District of Michigan
Southern Division at Detroit**

Case No. 13-57498-TJT

In Re: **Ernest E. Pettigrew**

Chapter 13

and: **Wanetta Pettigrew**

Debtor(s).

Honorable **Thomas J. Tucker**

ORDER MODIFYING DEBTORS' CONFIRMED CHAPTER 13 PLAN

Debtor(s) having filed a Second Proposed Plan Modification, and no objections or response having been filed, or a hearing having been held, and it appearing to the Court that good cause exists for the relief requested by Debtor(s), and the Court being otherwise advised, **NOW THEREFORE**,

IT IS HEREBY ORDERED that Debtors' Chapter 13 Plan as previously confirmed herein on or about March 19, 2014, is hereby modified only as follows:

(a.) Debtors are **Excused** from paying to the Chapter 13 Trustee their 2014 tax refunds in the total amount of \$7,792.00.

(b.) Debtors are **Excused** from paying to the Chapter 13 Trustee their 2015 tax refunds in the total amount of \$6,916.00.

(c.) Debtors are **Excused** from paying to the Chapter 13 Trustee their 2016 tax refunds in the total amount of \$6,625.00.

(d.) Debtors are **Excused** from paying to the Chapter 13 Trustee their 2017 tax refunds in the total amount of \$6,933.00.

(e.) Debtors are **Excused** from paying to the Chapter 13 Trustee their 2018 tax refunds in the total amount of \$211.00.

IT IS FURTHER ORDERED that in all other respects Debtor(s)' confirmed Chapter 13 Plan, as most recently modified if at all, shall remain unchanged.

“EXHIBIT 1”



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FIREBAUGH & ANDREWS 734-722-2999 HELEN Case Query

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Recently Accessed Cases 13-57498-TJT Ernest E. Pettigrew

13-57498-TJT Ernest E. Pettigrew (xxx-xx-1073) 44361 Fair Oaks • • Canton • MI • 48187

Wanetta Pettigrew (xxx-xx-4509) 44361 Fair Oaks • • Canton • MI • 48187

Trustee: Tammy L. Terry

Attorney: FIREBAUGH & ANDREWS PLLC Case Status:

Bar Date(s): 1/27/2014 (has passed) 3/18/2014 (has pa

Confirmed: 3/19/2014

Active, Open Case

The data on these pages has not been audited and is provided for general information only.

64 Month(s) since Confirmation UP = \$0.00 TPI = \$102,247.08 TPILR = \$101,319.03 BOH = \$2,354.52 BOH+FEES = \$2,559.26

Line	Name	Claimed Amount	Mortgage Due	Coll / Value	Interest Rate	Monthly Payment	To Be Paid	Mo
ATTORNEY FEE, CLS 2								
1	FIREBAUGH & ANDREWS PLLC	\$11,465.22						
ARREARS,								
2	ADDED CREDITOR							
3	ADDED CREDITOR							
LEASE								
4	ADDED CREDITOR							
ADM EXP CLAIM								
5	ADDED CREDITOR							
CONT Lease, Sec or Vehicle,								
6	ADDED CREDITOR							
7	ADDED CREDITOR							
LEASE or SECURED GAP								
8	ADDED CREDITOR							
MORTGAGE								
9	SELECT PORTFOLIO SERVICING	\$62,604.74					\$953.29	
10	ADDED CREDITOR							
11	ADDED CREDITOR							
PRIORITY								
12	INTERNAL REVENUE SERVICE	\$8,076.21						

 Plan Terms Due to Creditors:
In from Debtor: Trustee's % Lump Sum \$ Delete Line **Debtor 1 Pay Schedules**

Who's Paying	Amount	Schedule	Upd	Calc
L & W ENGINEERI	\$0.00	MONTHLY	\$?
Ernest E. Petti	\$0.00	WEEKLY	\$?

Debtor 2 Pay Schedules

Who's Paying	Amount	Sch
CARROLLS LLC	\$0.00	WEEKLY
Wanetta Pettigr	\$0.00	WEEKLY

ATTACHMENT 1

LIQUIDATION ANALYSIS AND STATEMENT OF VALUE OF ENCUMBERED PROPERTY

TYPE OF PROPERTY	FAIR MARKET VALUE	LIENS	DEBTOR'S SHARE OF EQUITY	EXEMPT AMOUNT	NON-EXEMPT AMOUNT
PERSONAL RESIDENCE	150,300.00	229,000.00	0.00	0.00	0.00
REAL ESTATE OTHER THAN PERSONAL RESIDENCE	0.00	0.00	0.00	0.00	0.00
HHG/PERSONAL EFFECTS	3,770.00	0.00	3,770.00	3,770.00	0.00
JEWELRY	2,000.00	0.00	2,000.00	2,000.00	0.00
CASH/BANK ACCOUNTS	500.00	0.00	500.00	500.00	0.00
VEHICLES	6,500.00	13,211.54	2,500.00	2,500.00	0.00
OTHER (itemize)	1.00	0.00	1.00	1.00	0.00

Amount available upon liquidation	\$ 0.00
Less administrative expenses and costs	\$ 0.00
Less priority claims	\$ 14,000.00
Amount Available in Chapter 7	\$ 0.00

United States Bankruptcy Court
Eastern District of Michigan

In re:

Ernest E. Pettigrew
Wanetta Pettigrew

Debtor.

Case No. 13-57498-TJT
Chapter 13
Hon. Thomas J. Tucker

/

Notice of Deadline to Object to Proposed Chapter 13 Plan Modification

The deadline to file an objection to the attached proposed chapter 13 plan modification is 21 days after service.

If no timely responses are filed to a proposed post-confirmation plan modification, the proponent may file a certificate of no response and request entry of an order approving the plan modification.

If a timely objection is filed, the Court will set the matter for hearing and give notice of the hearing to the debtor, the proponent of the plan modification, the trustee and any objecting parties. In that event, the plan modification will become effective when the Court enters an order overruling or resolving all objections.

Objections to the attached proposed chapter 13 plan modification shall be served on the following:

Firebaugh & Andrews, P.L.L.C.
38545 Ford Road, Suite 104
Westland, Michigan 48185

Tammy L. Terry, Esq.
Chapter 13 Trustee
535 Griswold, Suite 2100
Detroit, Michigan 48226

/s/ Roberta W. Andrews

Date: August 1, 2019

Roberta W. Andrews (P-54001)
Firebaugh & Andrews, PLLC
Attorney for Debtor(s)
38545 Ford Road, Suite 104
Westland, Michigan 48185
(734) 722-2999
firebaughandrews@comcast.net

United States Bankruptcy Court
Eastern District of Michigan
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Case No. 13-57498-TJT

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and: **Wanetta Pettigrew**

Honorable **Thomas J. Tucker**

Debtor(s).

PROOF OF SERVICE

I, the undersigned, certify that on August 1, 2019 copies of the following document(s) filed in the above captioned case:

1. **DEBTOR(S)' SECOND PROPOSED PLAN MODIFICATION** (dated: July 23, 2019), together with all exhibits and attachments, if any;
2. **NOTICE OF DEADLINE TO OBJECT TO PROPOSED CHAPTER 13 PLAN MODIFICATION** (dated: August 1, 2019)

were served upon all those parties specified on the matrix list attached hereto, at the addresses specified for said parties on such matrix list, all by first class mail with fully prepaid postage affixed, except the Chapter 13 Standing Trustee in this case who was served only through the Court's ECF system.

/ s / *Roberta W. Andrews*

dated: August 1, 2019

Samuel G. Firebaugh (P-34276)
Roberta W. Andrews (P-54001)
Firebaugh & Andrews, P.L.L.C.
Attorneys for Debtor(s)
38545 Ford Road, Suite 104
Westland, MI 48185
(734) 722-2999
FirebaughAndrews@comcast.net

Label Matrix for local noticing
0645-2
Case 13-57498-tjt
Eastern District of Michigan
Detroit
Thu Aug 1 11:10:05 EDT 2019

AT & T Uverse
P.O. Box 6500
Sioux Falls, SD 57117-6500

3rd Circuit Court
Attention Civil Division
2 Woodward Avenue
Detroit, MI 48226-3494

ALTAIR OH XIII, LLC
C O WEINSTEIN AND RILEY, PS
2001 WESTERN AVENUE, STE 400
SEATTLE, WA 98121-3132

AT & T Wireless
Receivables Management Department
P.O. Box 2667
Houston, TX 77252-2667

AT&T / SBC
225 W. Randolph St., Floor 27A
Chicago, IL 60606-1839

Account Receivables
2223 Broadway
Scottsbluff, NE 69361-1906

Athena J. Aitas
31440 Northwestern Highway
Suite 200
Farmington Hills, MI 48334-5422

AllianceOne Receivables Management, Inc.
4850 Street Road, Ste 300
Feasterville Trevose, PA 19053-6643

American Medical Collection Agency
2269 South Saw Mill River Road
Elmsford, NY 10523-3832

Roberta W. Andrews
38545 Ford Rd.
Suite 104
Westland, MI 48185-7901

(p) ANN ARBOR CREDIT BUREAU INC
PO BOX 7820
ANN ARBOR MI 48107-7820

Applied Card Bank
Bancard Center
P.O. Box 11170
Wilmington, DE 19850-1170

Arrow Financial Services
5996 West Touhy Avenue
Niles, IL 60714-4610

Asset Acceptance LLC
P.O. Box 2036
Warren MI 48090-2036

AvanteUSA
2950 S. Gessner Road
Suite 265
Houston, TX 77063-3751

Bank of America
100 North Broadway
Saint Louis, MO 63102-2728

Beneficial
P.O. Box 8633
Elmhurst, IL 60126-8633

Heather R. Burnard
31440 Northwestern Highway
Suite 200
Farmington Hills, MI 48334-5422

CMI
P.O. Box 3097
Carrollton, TX 75007-1912

(p) COMCAST
41112 CONCEPT DR
PLYMOUTH MI 48170-4253

Caliber Home Loans, Inc.
13801 Wireless Way
Oklahoma City, OK 73134-2500

Canton Township Treasurer
PO box 87010
Canton, MI 48187-0010

Capital One
P.O. Box 30285
Salt Lake City, UT 84130-0285

Charter Township of Canton- Water Dept.
1150 South Canton Center Road
Canton, MI 48188-1608

Chase
P.O. Box 711210
Columbus, OH 43218

Christiana Trust, a division of Wilming
Serviced by Select Portfolio Servicing,
3815 South West Temple
Salt Lake City, UT 84115-4412

Community EMS
c/o BHCC System Business Office
32780 Grand River Avenue
Suite 202A
Farmington, MI 48336-3186

(p) CONGRESS COLLECTION
28552 ORCHARD LAKE RD
STE 200
FARMINGTON HILLS MI 48334-2954

Credit Management, Inc., LP
4200 International Parkway
Carrollton, TX 75007-1912

(p)CREDIT PROTECTION ASSOCIATION LP
PARKWAY CENTER V
2500 DALLAS PARKWAY SUITE 500
PLANO TX 75093-4867

DTE Energy
2000 Second Avenue
Detroit, MI 48226-1279

DTE Energy
One Energy Plaza
2120 WCB
Detroit, MI 48226

Diversified Receivables Management, Inc.
f/b/o Medical Center Emergency Service
P. O. Box 2560
Ann Arbor, MI 48106-2560

Drs. Harris, Birkhill, Wang,
Songe and Associates, P.C.
attn: Patient Accounts
P.O. Box 2082
Dearborn, MI 48123-2082

Shawn C. Drummond
31440 Northwestern Highway
Suite 200
Farmington Hills, MI 48334-5422

Emergency Physician of Michigan
P. O. Box 96115
Oklahoma City, OK 73143-6115

Fingerhut Direct Marketing
6250 Ridgewood Road
Saint Cloud, MN 56303-0820

Samuel Firebaugh
38545 Ford Road
Suite 104
Westland, MI 48185-7901

First Federal Credit Control, Inc.
24700 Chagrin Blvd Suite 205
Beachwood, OH 44122-5662

Marcy J. Ford
31440 Northwestern Highway
Suite 200
Farmington Hills, MI 48334-5422

Moe Freedman
3030 W. Grand Blvd.
Ste. 10-200
Detroit, MI 48202-6030

Gardner White (Retail Services)
Retail Services
Dept. 15521
Wilmington, DE 19850-5521

Great Expressions Dental Center
300 E. Long Lake Road
Suite 311
Bloomfield Hills, MI 48304-2377

HSBC Mortgage Corporation (USA)
P.O. Box 4552
Buffalo, NY 14240-4552

HSBC Mortgage Services Inc
636 Grand Regency Blvd.
Brandon, Florida 33510-3942

HSBC Mortgage Services, Inc.
P.O. Box 21188
Eagan, Minnesota 55121-0188

HURON MEDICAL CENTER C/O MMCC xxx3896
6324 TAYLOR DR
FLINT, MI 48507-4680

HURON VALLEY AMBULANCE C/O MMCC ACCT #3
6324 TAYLOR DRIVE
FLINT, MI 48507-4680

Harper Hutzel Hospital
attn: Patient Accounts
3663 Woodward Ave.
Suite 200
Detroit, MI 48201-2400

Homecomings Financial
attn: Bankruptcy Department
P.O. Box 939072
San Diego, CA 92193-9072

Huntington National Bank
attn: Legal Dept (Bankruptcy Notice)
41 South High Street
Columbus, OH 43215-6170

Huron Valley Ambulance
P. O. Box 673972
Detroit, MI 48267-3972

Huron Valley Outpatient
8391 Commerce Road
Commerce Township, MI 48382-4489

I. C. Systems, Inc.
444 Highway 96 East
P.O. Box 64378
Saint Paul, MN 55164-0378

Independent Emergency Phys. C40
P.O. Box 67000 Dept. 236301
Detroit, MI 48267-2363

Internal Revenue Service
Centralized Insolvency Operations
P.O. Box 7346
Philadelphia, PA 19101-7346

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Kilpatrick & Associates, P.C.
c/o Wayne County Treasurer
903 North Opdyke Road, Suite C
Auburn Hills, MI 48326-2693

Landmark Asset Receivables Mgt. LLC
7340 S. Kyrene RD
Tempe, AZ 85283-4573

Linda P. Silas
5834 Cherrywood Apartment 2406
West Bloomfield, MI 48322-4532

Mainwaring Pathology Group PC
P.O. Box 32615
Detroit, MI 48232-0615

Margaret W. Murphy
14038 Ohio
Detroit, MI 48238-4300

Merchants & Medical Credit Corp.
6324 Taylor Drive
Flint, MI 48507-4685

Michigan Bell Telephone Company
% AT&T Services, Inc
Karen Cavagnaro, Paralegal
One AT&T Way, Room 3A104
Bedminster, NJ 07921-2693

Michigan Department of Treasury
Bankruptcy Unit
PO Box 30168
Lansing, MI 48909
5 48909-7668

Michigan Healthcare Collections Inc.
P.O. Box 2107
Southfield, MI 48037-2107

Michigan Heart
5325 Elliot Drive
Suite 203
Ypsilanti, MI 48197-8633

Mid Michigan Collection
P.O. Box 130
Saint Johns, MI 48879-0130

Money Recovery Nationwide
801 South Waverly Road, Suite 100
Lansing, MI 48917-4200

Ms. C.Jane Varner, Interim Friend of
the Court; 3rd Circuit Court - FOC
Penobscot Building, Room 324
645 Griswold
Detroit, MI 48226-4105

NCO Financial Systems, Inc.
507 Prudential Road
Horsham, PA 19044-2308

Oakwood Healthcare System
attn: Patient Accounts
P.O. Box 2805
Dearborn, MI 48123-2803

Oakwood Hospital
P.O. Box 48458 Oak Park
Oak Park, MI 48237-6058

PALISADES COLLECTION, LLC
VATIV RECOVERY SOLUTIONS LLC, DBA SMC
AS AGENT FOR PALISADES COLLECTION, LLC
PO BOX 40728
HOUSTON TX 77240-0728

Palisades Collection
210 Sylvan Avenue
Englewood Cliffs, NJ 07632-2510

Ernest E. Pettigrew
44361 Fair Oaks
Canton, MI 48187-3247

Wanetta Pettigrew
44361 Fair Oaks
Canton, MI 48187-3247

Professional Emergency Care
c/o PARC
P.O. Box 1022
Wixom, MI 48393-1022

Professional Recovery Services, Inc.
f/b/o Household Recovery Services-VA
P. O. Box 1880
Voorhees, NJ 08043-7880

Quantum3 Group LLC as agent for
CP Medical LLC
PO Box 788
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
Galaxy Asset Purchasing LLC
PO Box 788
Kirkland, WA 98083-0788

Quest Diagnostics
PO Box 740020
Cincinnati, OH 45274-0020

Craig B. Rule
1650 West Big Beaver Road
Troy, MI 48084-3534

(p)RUSSELL COLLECTION AGENCY
PO BOX 7009
FLINT MI 48507-0009

ST MARY MERCY HOSP - PROF C/O MMCC xxx9841
6324 TAYLOR DR
FLINT, MI 48507-4680

ST MARY MERCY HOSP C/O MMCC xxx6616
6324 TAYLOR DR
FLINT, MI 48507-4680

Schueller MD
c/o First Federal Credit Control, Inc.
24700 Chagrin Blvd, Suite 205
Beachwood, OH 44122-5630

Sprint/ Nextel
Customer Service
P.O. Box 8077
London, KY 40742-8077

St. Joseph Mercy Hospital
5301 East Huron River Dr.
Ypsilanti, MI 48197-1051

St. Mary Mercy Hospital
attn: Patient Accounts
36475 Five Mile Road
Livonia, MI 48154-1988

State of Michigan
Department of Labor & Economic Growth
Unemployment Insurance Agency
3024 West Grand Boulevard
Detroit, MI 48202-6024

State of Michigan
Department of Treasury
Collection Division
P.O. Box 77929
Detroit, MI 48277-0437

State of Michigan
Department of Treasury
P.O. Box 30477
Lansing, MI 48909-7977

State of Michigan
Michigan State Disbursement Unit
P.O. Box 30354
Lansing, MI 48909-7854

State of Michigan, Department of Treasury
3030 W Grand Boulevard
Suite 10-450
Detroit, MI 48202-6030

Surendra M. Kumar, M.D.
33116 Palmer Road
Westland, MI 48186-5524

Tammy L. Terry
Buhl Building
535 Griswold
Suite 2100
Detroit, MI 48226-3681

U.S. Attorney
attn: Civil Division (IRS)
211 West Fort Street, Suite 2300
Detroit, MI 48226-3269

United Collection Bureau, Inc.
5620 Southwyck Boulevard, Suite 206
Toledo, OH 43614-1501

WAYNE COUNTY TREASURER
400 MONROE, STE 520
DETROIT, MICHIGAN 48226-2942

Washington Mutual/Providian
P. O. Box 9180
Pleasanton, CA 94566

Wayne County FOC
c/o Michigan State Disbursement Unit
P.O. Box 30351
Lansing, MI 48909-7851

Wayne County Treasurer
400 Monroe Street - 5th Floor
Detroit, MI 48226-2964

Wells Fargo Bank- Auto Finance
P.O. Box 29704
Phoenix, AZ 85038-9704

Wells Fargo Financial Michigan
2501 Seaport Drive, Suite BH300
Chester, PA 19013-2241

Wells Fargo Insurance Service Center
P. O. Box 2075
Coraopolis, PA 15108-6998

West Asset Management, Inc.
PO Box 2348
Sherman, TX 75091-2348

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4) .

Ann Arbor Credit Bureau
311 North Main Street
Ann Arbor, MI 48104

COMCAST
41112 Concept Dr.
Plymouth, MI
48170

(d) Comcast Cablevision
attn: Collections/Bankruptcy Dept.
12775 Lyndon
Detroit, MI 48227

Congress Collection Corp.
24901 Northwestern Highway
Suite 300
Southfield, MI 48075-2207

Credit Protection Association, L.P.
13355 Noel Road
Dallas, TX 75240

Jefferson Capital Systems LLC
PO BOX 7999
SAINT CLOUD MN 56302-9617

Russell Collection Agency, Inc.
P. O. Box 7009
Flint, MI 48507

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Caliber Home Loans, Inc.

(u)Christiana Trust

(u)Legacy Mortgage Asset Trust 2017-G52.

(u)Legacy Mortgage Asset Trust 2019-GS3

(u)Medical Center Emergency Service

(u)Select Portfolio Servicing, Inc

(u)Wayne County Treasurer

End of Label Matrix	
Mailable recipients	107
Bypassed recipients	7
Total	114

**United States Bankruptcy Court
Eastern District of Michigan**

In Re: **Ernest E. Pettigrew**

and: **Wanetta Pettigrew**

Debtor(s).

Case No. 13-57498-TJT

Chapter 13

Honorable **Thomas J. Tucker**

AFFIDAVIT OF JOINT DEBTOR

The Joint Debtor in the above captioned case hereby states and avers as follows:

1. I am the Joint Debtor in the above captioned case, and the following statements are made from my own personal knowledge.
2. During the term of our Chapter 13 Plan, we had to replace 4 appliances: a dishwasher for \$429.30, a stove \$901.16 for which I have receipts and a washer for \$684.00 in 2015 and a dryer in 2016 but I cannot locate the receipts.
3. We also had to have some major repairs done on our house.
4. We had a leak in the upstairs bathroom tub plumbing and the leak caused damage to the downstairs family room ceiling which cost approximately \$1,800.00 to repair the pipes and replace the drywall and ceiling tiles.
5. We also had to replace the garbage disposal and kitchen faucet for \$350.00.
6. During a harsh winter where we could not keep up on shoveling the deep snow, we purchased a snowblower for \$1,200.00 as it was the lowest priced and only one we could find in stock.
7. My spouse was in an auto accident in Spring, 2016 which caused our insurance rates to increase from \$3,314.00 per year to \$4,781.00 per year commencing June, 2016.
8. We struggled with unreliable transportation during the term of our plan. When we filed our case, we had a 2004 Mitsubishi Endeavor and a 1994 Ford F-150 with both of us having full-time jobs.
9. In 2015, the Endeavor's engine failed and we purchased a 2004 Cadillac Deville for \$2,300.00.

10. Later in 2015, the Ford F-150 became mechanically unreliable and we purchased a 2003 Envoy for \$3,400.00.

11. By 2018, the Cadillac required more repairs than would be worth it and it had rear-wheel drive and I would get stuck in the snow, so we purchased a 2006 GMC Envoy for \$4,395.00.

12. We did not budget for our homeowner's association dues because we only receive the bill twice a year and did not think about it when we filed, but we have struggled to pay the approximate \$1,200.00 per year required for a total additional expense of \$6,000.00.

I hereby declare under penalty of perjury that the above statements are true and accurate to the best of my personal knowledge, information and belief.

Dated: July 22, 2019


Wanetta Pettigrew
Wanetta Pettigrew, Joint Debtor